



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3188

ENFORCEMENT &  
COMPLIANCE ASSURANCE  
DIVISION

Reply To: 20-C04

**RETURN RECEIPT REQUESTED**

Mr. George C. Zoley  
CEO  
Geo Secure Services  
4955 Technology Way  
Boca Raton, Florida 33431-3367

Re: Request for Information Under the Federal Insecticide, Fungicide, and Rodenticide Act

Dear Mr. Zoley:

On behalf of the United States Environmental Protection Agency, Region 10 (EPA), I request Geo Group, Inc. ("GEO Group") submit the information specified below to EPA as part of an investigation to determine GEO Group's compliance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. §§ 136 et. seq. at the Northwest Detention Center, located at 1623 E J Street, Suite 2, Tacoma, Washington 98421 ("the Center"). EPA is looking into GEO Group's use of disinfectants and sanitizers at the Center since May 1, 2020. I request ("Request") the documents listed below, as it is a violation of federal law to use any registered pesticide in a manner inconsistent with its labeling.

Accordingly, please provide the following records/documents:

1. All labels of disinfectants and other pesticides being used on-site, including supplemental labels and diluted product labels.
2. Photos of the disinfectants being applied at the facility. Please show all sides of the container and capture clear photos of the entire label.
3. Disinfectant dilution mixing records for all disinfectants used at the facility since May 1, 2020, including who fills and mixes any disinfectant dispensing service containers on-site.
4. Disinfectant application records from May 1, 2020, to the present, and description of specifically where, how and by whom disinfectants are being applied within the facility.
5. Records showing the purchase of the disinfectants from May 1, 2020, to the present.
6. List of personal protective equipment (PPE) provided to detainees with accompanying photos of the PPE.
7. Records showing the frequency with which new, unused PPE is provided to detainees.
8. Records showing that detainees were provided training on how to properly apply any disinfectants being applied at the facility, as applicable, including that they were provided training on what PPE is required and how to properly use that PPE.

9. Medical records of detainees who were evaluated by a doctor after complaining of illness due to exposure to disinfectants. Please provide records for the incidents that have occurred since May 1, 2020.
10. Copy of the policy describing how staff or management should respond when detainees become ill.
11. Map or diagram showing the layout of the facility.
12. Contact information for Spartan Chemical Company representatives that provide service to the facility.
13. Copy of the most recent contract with Spartan Chemical Company.

You may assert a confidentiality claim covering part or all of the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential.” Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by Respondent and may be submitted separately to facilitate identification and handling by EPA. Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. 40 CFR 2.203; see also 41 Fed. Reg. 36902 (Sept. 1, 1976).

Within ten (10) business days of receipt of this Request, please submit a PDF copy of the records/documents that are responsive to this Request to Hurwit.Nicholas@epa.gov, along with a signed PDF copy of the accompanying Statement of Authorization (enclosure). For each PDF copy of a document produced in response to this Request, indicate on such copy or in some other reasonable manner, the Request item number to which it responds. You may also include a narrative statement to accompany the responsive records/documents. Similarly, if any portion or all of the narrative pertains to a specific Request item, please indicate the Request item number to which it corresponds.

Please know that federal law at 18 U.S.C. § 1001 authorizes criminal fines and/or imprisonment for knowingly or willfully providing false information to the United States Government.

Thank you in advance for your prompt attention to this Request. If you have any questions, please contact me at Hurwit.Nicholas@epa.gov or (206) 553-6221. Questions from legal counsel can be directed to Andrew Futerman in the Office of Regional Counsel at Futerman.Andrew@epa.gov or (206) 553-6709. Requests for additional time to respond must be made at least two business days prior to the deadline for submission of documents, so that EPA can properly consider such a request.

Sincerely,

Nick Hurwit, Inspector  
Air and Toxics Enforcement Section

Enclosure

cc: Mr. J. Wilson Eaton III  
Attorney, Young Law Group

## STATEMENT OF AUTHORITY TO ACT AS AUTHORIZED REPRESENTATIVE

I, \_\_\_\_\_ (the undersigned), acknowledge receipt of the foregoing Request for Information and certify that:

I am an Authorized Representative of Geo Group, Inc.

Attached hereto are \_\_\_\_\_ pages of PDF copies of documents or records. The attached pages are true and correct copies of documents or records that I presently have in my custody and/or control as an owner, officer and/or employee of Spartan Chemical Company.  
the physical address of which is \_\_\_\_\_.

I am one of the custodians of the records of which the attached pages are true and correct copies. Those documents that have been requested by EPA are being produced along with this Statement in response to the Request.

The records (of which the attached pages are true copies) involved here were and/or are received and/or kept in the normal course of regularly conducted business and activity of Geo Group, Inc.

I have made a diligent search and inquiry for all records which are reasonably described in the Request to which this Statement responds. I have not found or located, and I have not been told about, and I have no knowledge of, any documents or records falling within the descriptions set forth in the Request that have not been copied and submitted along with this Statement.

All responses to the inquiries contained in the Request are true, complete and accurate. I acknowledge that this Statement is submitted to the United States in connection with a matter within the jurisdiction of EPA and that any materially false statement of fact herein may be a federal crime under 18 U.S.C. § 1001.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

Type or Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Geo Group, Inc.